

# EXHIBIT B

**CABINETS TO GO, LLC,**  
**Plaintiff,**

**QINGDAO HAIYAN REAL ESTATE  
GROUP CO., LTD;  
QINGDAO DROUOT WOOD  
INDUSTRY CO. LTD.,  
ALNO INDUSTRY SDN BHD, and  
SCIOTO VALLEY WOODWORKING,  
INC. d/b/a VALLEYWOOD  
CABINETRY,**

**Defendants.**

**Chief Judge Waverly D. Crenshaw, Jr.**

**Magistrate Judge Jeffrey S. Frensley**

books, separately files taxes in its home country, owns property in its own respective name, has separate offices, hires and maintains its own workforce and enters into binding contracts independently from my ownership interest and the other corporations.

4. No employee of Haiyan travelled to Tennessee in “late” 2019, as alleged by CTG.

5. The first time I met Mr. Delves and Mr. Sullivan in person was on January 12, 2020 at CTG’s Leadership Summit (the “Summit”) in Franklin, Tennessee.

6. No employee of Haiyan traveled to Tennessee after January 2020.

7. Prior to receiving CTG’s sponsorship request for the Summit, I had made plans to travel to the US in January 2020 to tour the Kitchen and Bath Industry Show in Las Vegas, NV. My wife and I also planned a personal trip to visit our son Jian “Philip” Jiao in Columbus, OH. I accepted the invitation for Haiyan to attend the Summit because Haiyan representatives would already be in the US.

8. The sponsorship for the Summit was solicited by CTG and the \$15,000 was solely offered by Haiyan in honoring the business relationship between Haiyan and CTG. Haiyan attended the Summit in Tennessee from January 12 to 14, 2020, where Haiyan brought and presented its new product lines at CTG’s request.

9. Haiyan did not solicit any business or visit any other customers while in Tennessee for the Summit.

10. Jian “Philip” Jiao is my son. He is currently a law student at The Ohio State University Moritz College of Law in Columbus, Ohio.

11. While studying at Indiana University-Bloomington, from May 2016 to August 2016, and May 2017 to August 2017, Jian completed summer internships with Haiyan. From May

2018 to July 2019, Jian's gap year between undergraduate and law school, he worked as a manager for Valleywood Cabinetry in Waverly, Ohio.

12. Jian no longer works at either company since his law school enrollment in July 2019. He is currently and has been a full-time law student from August 2019 to present.

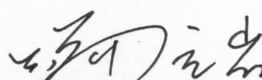
13. Since August 2019, because Jian is in the United States and understands English, Jian was asked at various times by several Haiyan employees to help with transportation, interpretation, or other ministerial tasks from time to time. Jian has never had any ownership role for any of the Defendant companies in this litigation or authority to bind any of the Defendants.

14. Jian attended the Leadership Summit in January 2020 with me to visit his family and to assist with translation.

15. It was in Jian's role assisting me with translation and interpretation that he corresponded with Jason Delves regarding CTG's interest in purchasing Valleywood.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 16-03, 2022.

  
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Liyan Jiao